



Instituto Peruano del Espárrago y Hortalizas

BY EMAIL

December 5, 2005

Standardization Section, Fresh Products Branch
Fruit and Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave. SW.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Re: Proposal to Revise the United States Standards for Grades of Fresh Asparagus

Dear Sir or Madam:

On behalf of the Peruvian Asparagus and Vegetables Institute (Instituto Peruano del Espárrago y Hortalizas (IPEH)), and in response to the Agricultural Marketing Service's (AMS) notice,¹ we hereby submit these comments regarding the AMS's proposal to revise the U.S. Standards for Grades of Fresh Asparagus.

Asparagus growers in Peru export both green fresh asparagus and white fresh asparagus to the United States. While both green and white fresh asparagus from Peru are marketed in the United States, the color requirements of the current U.S. Standards for Grades of Fresh Asparagus only provide for the grading of green asparagus.

The revisions to the U.S. standards proposed by the AMS would modify the "color" element of Grades U.S. No. 1 and U.S. No. 2 by replacing the requirement that a proportion of the shaft that be "of a green color" with a requirement that this proportion of the shaft be "the color of the lot." The AMS determined that this revision "is warranted to facilitate the marketing of purple and white asparagus and improve the

¹ *United States Standards for Grades of Fresh Asparagus*, 70 Fed. Reg. 58370 (October 6, 2005)

usefulness of the standards in better serving the industry.”² The AMS developed its proposed revisions after considering comments from received from interested parties, including representatives of U.S. asparagus growers in California and Michigan.

As described by the AMS, the proposed revisions to the U.S. Standards for Grades of Fresh Asparagus would facilitate the marketing of the full range of fresh asparagus products that Peru exports to the United States. On that basis, IPEH supports the proposed revisions.

If you have questions or require additional information, please feel free to contact John Totaro or Mateo Paz-Soldan, IPEH's counsel in Washington, at (202) 333-8800.

Respectfully submitted,

/s/
Beatriz Tubino Bardales
Manager, IPEH

2 *Id.*